

Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MIYANO MACHINERY USA INC.,
Plaintiff,

-vs-

No. 08 C 526

MIYANOHITEC MACHINERY, INC.,
THOMAS ("TOM") MIYANO, a/k/a
TOSHIHARU MIYANO and STEVEN
MIYANO, a/k/a SHIGEMORI MIYANO,

Defendants.

MIYANOHITEC MACHINERY, INC.,
THOMAS ("TOM") MIYANO, a/k/a
TOSHIHARU MIYANO and STEVEN
MIYANO, a/k/a SHIGEMORI MIYANO,

Counterclaim-Plaintiffs,

-vs-

MIYANO MACHINERY USA INC.,

Counterclaim-Defendant,

and

MIYANO MACHINERY, INC.,

Third-Party Defendant.

- CONFIDENTIAL - ATTORNEYS' EYES ONLY -

The deposition of THOMAS TOSHIHARU
MIYANO, called by the Plaintiff for examination,
taken pursuant to the Federal Rules of Civil
Procedure of the United States District Courts
pursuant to the taking of depositions, taken before
Barbara A. Wichmann, C.S.R., a Notary Public within
and for the County of Cook, State of Illinois, at
Suite 2850, 200 West Adams Street, Chicago, Illinois,
on Wednesday, April 23, 2008, at the hour of
10:06 a.m.

1 Machinery's old owner's wife. That's all.

2 This is -- you know. So I know this person
3 very well, but this time I forget his name. Sorry.

4 Q. Okay. Did you contact Don Caruso?

5 A. Don Caruso. Don Caruso.

6 I -- I forget this name.

7 Q. Okay. Did you contact anyone in Indiana
8 that you remember?

9 A. Indiana -- let's see. One guy named --
10 sorry. I forget.

11 Q. What is your interest in MiyanoHitec
12 Machinery?

13 MR. BAKER: Form.

14 MR. MANZO: Strike that.

15 BY MR. MANZO:

16 Q. Do you have any interest in Miyano
17 Machinery -- sorry -- MiyanoHitec Machinery Inc.?

18 A. This company established by my son Steven
19 Miyano. I'm the father, so I want to help his new
20 business.

21 Q. Any other interest?

22 A. No, sir.

23 Q. Do you have --

24 MR. BAKER: Go ahead.

1 A. No.

2 Q. Does -- and so just so I understand this --
3 strike "does."

4 You are not an employee of MiyanoHitec
5 Machinery, correct?

6 A. Yes, sir.

7 Q. You are not a director?

8 A. Yes, sir.

9 Q. You are not an officer --

10 MR. BAKER: You have to answer out loud.

11 BY MR. MANZO:

12 Q. -- correct?

13 MR. BAKER: He was shaking his head no, but --

14 THE WITNESS: Sorry.

15 MR. BAKER: You have to say no.

16 THE WITNESS: I'm sorry.

17 BY THE WITNESS:

18 A. My -- today I'm -- had a, like -- kind of
19 like communication with the Indian people. India --
20 Japanese people -- Japanese people say like that,
21 yes, yes, yes. (Indicating)

22 But the Indian people say sometime like
23 that. (Indicating).

24 So, sorry, I have a mix-up to this, so